

SILVERMAN | ATTORNEYS  
& ASSOCIATES | AT LAW

December 29, 2021

VIA ECF

MEMO ENDORSED

Hon. Kenneth M. Karas  
United State District Judge  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: *Galgano v. County of Putnam, et al.*  
SDNY Docket No.: 16 CV 3572 (KMK)

Dear Judge Karas:

We represent Defendant, the County of Putnam, in the captioned matter and respectfully submit this letter on behalf of all parties. We write to respectfully request an order regarding some logistical issues with respect to the parties' summary judgment motions and also to request a two-week extension of the summary judgment deadlines. All parties join in these requests.

The parties have been working on preparation of the various motions. As we have done so, it became apparent that the voluminous exhibits that will be used in this case will overlap to a great extent. The parties have agreed to submit a joint exhibit list in an effort to simplify the Court's review of the motions. If the Court agrees with this proposal, only one set of exhibits will be filed and all parties can refer to the exhibits as if they had filed the exhibits themselves. Relatedly, only one courtesy copy of the exhibit list and exhibits will be provided to the Court.

In addition, although this was not discussed during the pre-motion conference, the parties respectfully request that the "bundling" procedure be used to file the motions. Thus on the reply deadline the parties would file the exhibit list and exhibits, along with respective notices of motion, any declarations or affidavits, and the various memoranda of law.

We also respectfully request a two-week extension of the deadlines for the summary judgment motions. The extension is requested because the parties will require some additional time to collaborate on the joint exhibit list (if permitted by the Court) and also because some members of the defense counsel team's families have recently become sick with Covid-19 and/or tested positive, while others have been exposed to the virus. Due to the need to isolate or quarantine and care for children and other family members, some members of the defense counsel team will be unable to devote the time and attention needed to complete the motion at this time. The parties are mindful of the fact that the Court initially granted a generous briefing schedule and we make this request because of the unique circumstances of this case and the unfortunate fact that some family members of counsel have contracted Covid-19 amid the current surge in the New York area.


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If the extension is granted, the motions will be due to be served on January 28, 2022, opposition will be served on March 11, 2022 and the replies will be served on April 1, 2022. If bundling is permitted as discussed above, all papers will be filed on April 1, 2022.

Thank you for your consideration of this matter. All parties wish the Court and its staff a happy and healthy New Year.

Respectfully yours,

**SILVERMAN & ASSOCIATES**




Lewis R. Silverman

LRS/hj

cc: All Counsel of Record (Via ECF)

All requests are granted.

**SO ORDERED**



**KENNETH M. KARAS U.S.D.J.**

White Plains  
December 30, 2021